soil

renewal, R&D, solvent, extraction,

Mr. Alan Cash, President Terra-Kleen Response Group, Inc. 3970 Sorrento Valley Boulevard, Suite B San Diego, California 92121

Dear Mr. Cash:

In response to your letter dated February 20, 1998 requesting a one-year renewal, the National Program Chemicals Division (NPCD), Office of Pollution Prevention and Toxics (OPPT), U.S. Environmental Protection Agency (EPA) hereby grants renewal of the PCB disposal research and development (R&D) approval issued to the Terra-Kleen Response Group, Incorporated, of San Diego, California. This R&D approval applies only to Terra-Kleen's one-gallon batch process. The approval is entitled "Approval to Conduct Research and Development Tests to Dispose of Polychlorinated Biphenyls (PCBs), Removal of PCBs from Soil, One-Gallon PCB Soil Washing Process, Limited to Operations at the San Diego, California Facility." EPA renews this approval to perform research and development into PCB disposal pursuant to Section 6(e)(1) of the Toxic Substances Control Act of 1976, Public Law No. 94-469, and the Federal PCB Regulations, 40 CFR Part 761.60(e), (48 Federal Register, 13185, March 30, 1983). effective dates for the renewed R&D approval shall be from the date of signature to February 28, 1999.

This approval limits the disposal of PCB contaminated material to 100 pounds for each treatability study and 1000 pounds PCB contaminated soil total under this approval. The purpose of this approval is to conduct research and development on an alternative technology to remove PCBs from soil using a proprietary solvent, to levels less than 2 ppm PCBs. Other environmental media containing PCBs may also be treated by Terra Kleen only through prior EPA approval of any major modification to this approval.

On completion of the studies, Terra Kleen must store all the materials resulting from the tests in EPA-approved facilities according to 40 CFR 761 regulations.

No material generated as a result of the R&D studies may be transported off-site except for storage or disposal in accordance

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with the requirements promulgated at 40 CFR 761 for the original concentration of PCBs in the feed, unless it is confirmed to EPA's satisfaction through a formal demonstration, that these materials contain less than 2 ppm PCB in any non-aqueous phase or 3 ppb PCB in any aqueous phase (or unless Terra Kleen provides for EPA verification of PCB analysis). Please direct matters concerning this subject to Hiroshi Dodohara of my staff at (202) 382-3959.

Sincerely,

John W. Melone, Director National Program Chemicals Division

cc: Yosh Tokiwa
USEPA Region IX

## TERRA-KLEEN

"Supplying Solutions for Contaminated Soil"

February 20, 1998

Mr. Hiroshi Dodohara
Office of Pollution Prevention and Toxic Substances
EPA
Room NE 118
401 M Street SW
Washington, DC 20460

3CQ

RE: Treatability Study Permit

Dear Mr. Dodohara:

Terra-Kleen's yearly bench scale permit for performing treatability studies in the San Diego laboratory expires at the end of February. Terra-Kleen requests that this permit be extended for an additional year (or greater, if allowable).

Should you need any additional information from Terra-Kleen for the processing of this extension, please advise.

Sincerely,

Alan B. Cash President